

ERIC V. KLEINER, ESQ.*
385 SYLVAN AVENUE
SUITE 29, 2ND FLOOR
ENGLEWOOD CLIFFS, NJ 07632
Tel: (201) 394-6229

**member NY, NJ & DC Bars, NYSD, CA3DCIR.*
New Jersey Bar No. 003951988

NOVEMBER 15, 2024

SENT VIA ECF ONLY

HONORABLE MICHAEL A. HAMMER, U.S.M.J.
UNITED STATES DISTRICT COURT OF NEW JERSEY
MARTIN LUTHER KING, JR. FEDERAL BLDG. AND COURTHOUSE
50 WALNUT STREET
2ND FLOOR
NEWARK, NJ 07102

RE: COVER LETTER EXTENDING TIME PERIOD OF ORDER OF
9/17/24 ADMINISTRATIVELY TERMINATING MATTER WITHOUT
PREJUDICE [NOT UNDER Fed. Civ. P. 41]

MYRLENE LAURINCE V. CITY OF ENGLEWOOD, et als.

Civil Action No. 2:23-CV-03063 (JXN/MAH)

Dear Judge Hammer:

Please accept this timely letter filed in compliance with the Court's Order of 9/17/24 [document #32-att. to this letter]. This letter serve to request that the time under the present Order be extended sixty (60) days from 11/18/24-1/17/25 due to the fac t that the NJ Office of the Attorney General maintains to this present day

that their investigation of the administrative aspect of the shooting as to the police officers remains ongoing. My request for an updated timetable from the AG has been not responded to substantively. That fact precludes all parties from engaging in any meaningful discovery since the OAGNJ houses the entire voluminous discovery file of audio and video recordings and internal affairs reports as well as toxicology and pathology and other forensic based evidence. The parties' unified position since this matter has been filed with this Court is that the OAGNJ files and tangible items are essential and the case cannot move forward in the discovery phase without these items.

I also alert the Court that the survivors of the decedent of Bernard Placide have formally requested a federal grand jury be convened to criminally investigate potential federal civil; rights charges. To date, the U.S. Attorney's Office has not indicated to plaintiff or undersigned what the status of this request is.

either this referral request was acted upon or not. find the proposed consent order to effectuate an administrative termination without prejudice that all parties request be entered by the Court due t the ongoing delay in the OAGNJ internal IA investigation process concerning the officers involved in the shooting death of Bernard Placide, Jr.

Respectfully submitted:

ERIC V. KLEINER, ESQ.

ATTORNEY FOR THE PLAINTIFF

DATED: 11-15-24

cc.

David Pack, Esq. [via ecf with attachment]

Robert Renaud, Esq. [via ecf with attachment]

SO COVERED

sd Michael A. Hammer

Michael A. Hammer, U.S.M.J.

Date: **11/18/24**

Deadline to extend the stay / termination
or restore matter to active list extended to:

January 17, 2025